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MARY E. D'ANDREA CLERK
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By: SPERO T. LAPPAS, Esquire
Pa. Supreme Court ID no. 25745
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IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

RANDY YORDY,
PLAINTIFF
v.

SCOTT BROWN,
individually
and in his official capacity
as an employee and agent of
the PENNSYLVANIA STATE POLICE
Defendant

PAUL EVANKO,
individually
and in his official capacity
as an employee and agent of
the PENNSYLVANIA STATE POLICE
Defendant, et alii

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:
:
: CIVIL ACTION 1:01-cv-0206
:
: JURY TRIAL DEMANDED
:
: JUDGE KANE
:
:
:
:
:
:

PRAECIPE TO ATTACH REVISED WITNESS AND EXHIBIT LISTS
TO PLAINTIFF'S PRETRIAL MEMORANDUM

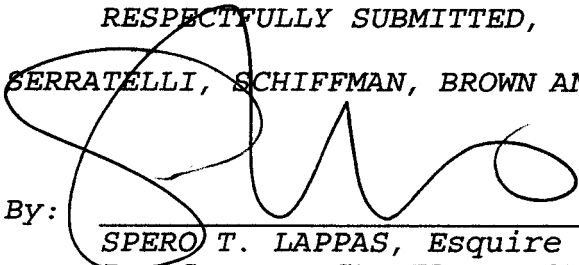
SERRATELLI, SCHIFFMAN BROWN AND CALHOON, P.C.
By: SPERO T. LAPPAS, Esquire

Please attach Exhibits A and B hereto, the revised Exhibit and Witness Lists to the Plaintiff's Pretrial memorandum.¹

RESPECTFULLY SUBMITTED,

SERRATELLI, SCHIFFMAN, BROWN AND CALHOON, P.C.

By:



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ATTORNEYS FOR THE PLAINTIFF

¹ The new witness and exhibits relate to an incident by which Defendant Scott Brown was fired from the Pennsylvania State Police for job related misconduct while on duty. This information was never revealed by the defense to Plaintiff's counsel who discovered it independently between December 12 and 16, 2002.

SERRATELLI, SCHIFFMAN BROWN AND CALHOON, P.C.
By: SPERO T. LAPPAS, Esquire

WITNESS.LST.wdb - YORDY WIT

WITNESS #

WITNESS

1 BARRY BRINSER
2 BERON STEAGER
3 BRIAN PLASTERER
4 C. TOWNSEND VELKOFF, MS
5 CHARLES FORTNEY
6 CHARLES MACKLIN, ESQUIRE
7 CHARLES SCHMIDT, ESQUIRE
8 CHRISTINE KOSH, PSP
9 COLEMAN MCDONOUGH, PSP
10 DEFENSE TECHNOLOGY CORP
11 DONNA BROWN
12 EARL BLOSE
13 ELIZABETH VALENTINE
14 ERNST BALTIMORE, PSP
15 FRANCIS GROLEMUND, PSP
16 GEORGE PEACH, PSP
17 GLENN DOMON, PSP
18 GORDON BUSHELL, MD
19 HERSHEY MEDICAL CENTER
20 JOSHUA LOCK, ESQUIRE
21 KATHERINE DOUTT, PSP
22 KENNETH HILL, PSP
23 LARRY WILLIAMS, PSP
24 LINDA BONNEY, PSP HR DIR
25 LYNNE MOUNTZ
26 MERVIN RODRIGUEZ, PSP
27 MICHAEL GREEVY, PHD
28 PAUL EVANKO
29 PSP RECORDS CUSTODIAN
30 RANDY YORDY
31 ROBERT CLARK, PSP
32 ROBERT MRGICH
33 ROBERT MRGICH, PSP
34 ROGELIO GARCIA
35 ROGER CADIEUX, MD
36 ROGER SANTIWANY
37 SCOTT BROWN
38 STEPHEN CARUSO
39 STEPHEN KIESSLING, PSP
40 SUSQUEHANNA HEALTH SYS.
41 SYLVIA CUETO
42 UNIVERSITY EMS SERVICE
43 VICKIE RAE SMITH
44 WILLIAM FULTON, ESQUIRE
45 ROBERT TITLER, PSP
46 SAMUEL PATTERSON, PSP
47 TODD BRIAN, PSP
48 LEON BROWN, PSP
49 KEVIN KEARNEY, PSP
50 MARSHALL MARTIN, PSP

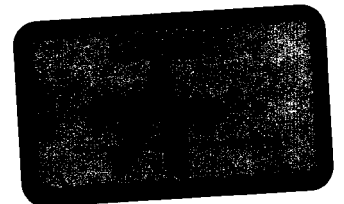


	EXHIBIT #	EXHIBIT	DATE OF EXHIBIT	IDENTIFIED	ADMITTED
1	1.01	DEPOSITION OF SCOTT BROWN (CCP)	July 09, 2002		
2	1.02	DEPOSITION OF SCOTT BROWN (MDPA)	January 18, 2002		
3	1.03	FIREARMS SCORING TALLY SHEET FOR SCOTT BROWN	April 08, 1998		
4	1.04	VIDEOTAPE OF ASSAULT	February 04, 1999		
5	1.05	MEMO FROM BROWN TO GROLEMUND	May 08, 1997		
6	1.06	SCHMIDT, RONCA, AND KRAMER COMMERCIAL VIDEOTAPE			
7	1.07	MEMO RE SCOTT BROWN (BPR 10248/DAR)	December 15, 1997		
8	1.08	PHOTOGRAPHS OF SCOTT BROWN			
9	1.09	SCOTT BROWN INTERVIEW	March 23, 1999		
10	1.10	PLEADINGS IN BROWN V. YORDY			
11	1.11	HERSHEY MEDICAL CENTER RECORDS FOR SCOTT BROWN			
12	1.12	AMBULANCE RECORDS FOR SCOTT BROWN	February 04, 1999		
13	2.01	DEPOSITION OF BARRY BRINSER			
14	2.02	DEPOSITION OF BARRY BRINSER (CCP)			
15	2.03	STATEMENT OF BARRY BRINSER	February 04, 1999		
16	2.04	HOSPITAL RECORDS FOR BARRY BRINSER	February 04, 1999		
17	3.01	DEPOSITION OF BERON STEAGER			
18	3.02	DEPOSITION OF BERON STAEGGER (CCP ACTION 5320 S 2000)	September 04, 2002		
19	3.03	STATEMENT OF BERON STEAGER	February 05, 1999		
20	4.01	DEPOSITION OF PAUL EVANKO	January 01, 2002		
21	5.01	DEPOSITION OF VICKIE SMITH			
22	5.02	DEPOSITION OF VICKIE RAE SMITH (CCP)	June 11, 2002		

	EXHIBIT #	EXHIBIT	DATE OF EXHIBIT	IDENTIFIED	ADMITTED
23	5.03	RECORDS FOR COMMONWEALTH V VICKIE RAE SMITH			
24	5.04	CRIMINAL COMPLAINT COMMONWEALTH V VICKIE SMITH			
25	6.01	GENERAL INVESTIGATION REPORT IAD 11-257	April 09, 1999		
26	6.02	PSP INCIDENT REPORT H1-1051327	February 09, 1999		
27	6.03	SEARCH WARRANT, APPLICATION, INVENTORY AND RECORDS SEIZED	March 04, 1999		
28	6.04	DEPOSITION OF STEPHEN CARUSO (CCP)	June 11, 2002		
29	6.05	CHEMICAL TESTINGS WARNING FOR RANDY YORDY	February 09, 1999		
30	6.06	DEPOSITION OF STEPHEN KIESSLING (CCP)	September 04, 2002		
31	6.07	PSP COMMUNICATIONS MEMO	February 04, 1999		
32	6.08	PSP RADIO COMMUNICATIONS TAPE	February 04, 1999		
33	6.09	MATERIAL DATA SAFETY SHEET			
34	6.10	PSP FORENSICS CID REPORT RE BROWN'S FIREARM	March 11, 1999		
35	6.11	STATEMENT OF MERVIN RODRIGUEZ, PSP	February 05, 1999		
36	6.12	DEPOSITION OF ROBERT CLARK (CCP)	September 04, 2002		
37	6.13	AERIAL PHOTOS OF OLD JONESTOWN ROAD	March 11, 1999		
38	6.14	PHOTOGRAPHS OF INCIDENT (A,B,C,D)			
39	7.01	PERSONNEL FILE FOR SCOTT BROWN			
40	7.02	DISCIPLINARY RECORD RE SCOTT BROWN	July 16, 1997		
41	7.03	DISCIPLINARY ACTION REPORT RE SCOTT BROWN	December 10, 1997		
42	7.04	ARBITRATION OPINION AND AWARD	June 28, 1998		
43	7.05	ARBITRATION OPINION RE SCOTT BRWON	April 26, 1999		
44	7.06	DISCIPLINARY SUMMARY REPORT	April 30, 1997		

	EXHIBIT #	EXHIBIT	DATE OF EXHIBIT	IDENTIFIED	ADMITTED
45	7.07	GENERAL INVESTIGATION REPORT RE SCOTT BROWN	May 09, 1997		
46	7.08	EMPLOYEE PERFORMANCE REVIEW	March 05, 1999		
47	7.09	MEMO TO LINDA BONNEY	September 19, 2000		
48	8.01	DEPOSITION OF RANDY YORDY			
49	8.02	DEPOSITION OF RANDY YORDY (CCP)	June 11, 2002		
50	8.03	RECORDS FOR COMMONWEALTH V. YORDY			
51	8.04	PHOTOGRAPHS OF RANDY YORDY			
52	8.05	CRIMINAL COMPLAINT COMMONWEALTH V YORDY			
53	8.06	HERSHEY MEDICAL CENTER RECORDS FOR RANDY YORDY			
54	8.07	MEDICAL BILLS FOR RANDY YORDY			
55	8.09	PRELIMINARY HEARING TRANSCRIPT, COMM V YORDY	February 23, 1999		
56	8.10	EMERGENCY ROOM REPORT OF SYLVIA CUETO MD (RANDY YORDY)	February 04, 1999		
57	8.11	EMERGENCY ROOM REPORT OF ELIZABETH VALENTINE MD (RANDY YORDY)	February 05, 1999		
58	8.12	AMBULANCE RECORDS FOR RANDY YORDY	February 04, 1999		
59	9.01	PSYCHOLOGICAL RECORDS FOR SCOTT BROWN			
60	9.02	PSYCHIATRIC REPORT RE SCOTT BROWN	December 12, 2000		
61	9.03	PSYCHIATRIC REPORT RE SCOTT BROWN	November 17, 2000		
62	9.04	RECORDS OF MICHAEL GREEVY			
63	9.04	MENTAL HEALTH RECORDS FOR SCOTT BROWN			
64	10.01	RECORDS RELATING TO CHRISTINE KOSH INCIDENT			
65	11.01	RECORDS RELATING TO BRIAN PLASTERER INCIDENT			
66	12.01	RECORDS RELATING TO ROGELIO GARCIA INCIDENT			

	EXHIBIT #	EXHIBIT	DATE OF EXHIBIT	IDENTIFIED	ADMITTED
67	12.02	COURT PAPERS RE GARCIA V BROWN			
68	12.03	STATEMENT OF ROGER SENTIWANY RE ROGELIO GARCIA INCIDENT			
69	12.04	SWORN STATEMENT OF CHARLES FORTNEY RE ROGELIO GARCIA	November 19, 1996		
70	13.01	RECORDS RE EARL BLOSE INCIDENT			
71	13.02	INTERNAL AFFAIRS INVESTIGATION RE EARL BLOSE INCIDENT			
72	13.03	LETTER #1 FROM CAPT KATHRYN DOUTT TO EARL BLOSE	March 29, 1994		
73	13.04	LETTER #2 FROM CAPT KATHERINE DOUTT TO EARL BLOSE	March 29, 1994		
74	14.01	GENERAL INVESTIGATION REPORT RE 4/10/96	June 18, 1996		
75	14.02	LETTER FROM KENNETH HILL			
76	15.01	MEMORANDUM FROM CAPTAIN TITLER TO CAPTAIN MCDONOUGH	September 10, 2002		
77	15.02	RECORDS RE BARBARA CHRISTIE/APRIL 3, 2002 INCIDENT			
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CERTIFICATE OF SERVICE

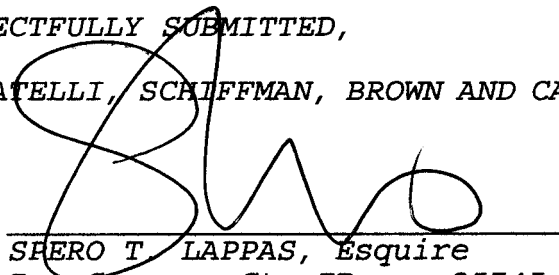
I hereby certify that on this date I served a true copy of the attached document upon the person(s) named below by mailing a copy addressed as follows, postage pre-paid, deposited into the U. S. Mail at Harrisburg, Pa.

GREGORY NEUHAUSER, ESQUIRE
OFFICE OF ATTORNEY GENERAL
LITIGATION SECTION
15TH FLOOR, STRAWBERRY SQUARE
HARRISBURG, PA. 17120

RESPECTFULLY SUBMITTED,

SERRATELLI, SCHIFFMAN, BROWN AND CALHOON, P.C.

By:


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December 16, 2002

SERRATELLI, SCHIFFMAN BROWN AND CALHOON, P.C.
By: SPERO T. LAPPAS, Esquire